

Paul Rosasco, P.E.
Engineering Management Support, Inc.
7720 West Jefferson Avenue, Suite 406
Lakewood, CO 80235

Dear Mr. Rosasco:

RE: Revised Work Plan for Removal Action Preconstruction Work, West Lake Landfill Superfund Site, June 20, 2014

The U.S. Environmental Protection Agency has reviewed the subject document, received June 23, 2014. EPA finds that the document adequately addresses the requirements of the pre-construction Order (EPA Docket No. CERCLA-07-2014-0002) and EPA's June 6, 2014 comments on the draft Work Plan, and hereby approves the document, subject to resolution of the following remaining issues:

USACE Comments 1 and 2: The requested information on establishing background values during site clearing was not provided in the revised work plan and must be included or referenced.

USACE Comment 6: The requested change was made on page 9 of the work plan but not in Table 1. Table 1 must be updated.

This approval does not extend to the Bird Hazard Monitoring and Mitigation Plan in Appendix A, nor to the Air Monitoring, Sampling and QA/QC Plan in Appendix B. The Order envisioned these plans as deliverables to be prepared and submitted separately after approval of the Work Plan, and approving them as part of the Work Plan would be administratively cumbersome.

In addition, there may be further changes required to these Plans before they can be approved, particularly with respect to the St. Louis Airport's approval of the Bird Hazard Monitoring and Mitigation Plan and the volatile organic compound analyte list in the Air Monitoring, Sampling and QA/QC Plan. The Air Monitoring Plan, when resubmitted, must be fully signed by the Respondents before it can be approved. The aerial photograph requested in EPA Additional Comment 5 on the draft Work Plan must also be provided, preferably as part of the deliverable addressing the work required in Paragraph 30(a) of the Order.

EPA is aware that the Missouri Department of Natural Resources provided a number of comments on the draft Work Plan in a letter dated June 18, 2014. The Respondents requested direction from EPA on how to respond to these comments in an e-mail from Paul Rosasco to Dan Gravatt dated June 20, 2014. MDNR is not a signatory to the Order and its comments should be considered advisory and not obligatory. Given the timing of these comments, and as I believe that some of MDNR's comments have been addressed, there is no requirement that Respondents' address these comments.

If you have any questions, you may contact me at (913) 551-7324.

Sincerely,

Daniel R. Gravatt, P.G.
Remedial Project Manager

Missouri-Kansas Remedial Branch
Superfund Division

Cc: Mr. Shawn Muenks, Project Manager, Missouri Department of Natural Resources
Ms. Victoria Warren, Director, Hydrogeology and Superfund, Republic Services
Mr. Bill Beck, Attorney, Lathrop & Gage